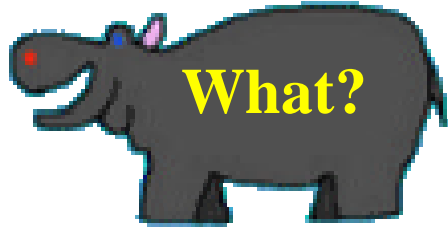


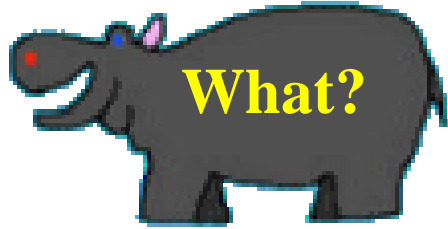
Why is there a HIPAA in
my office?





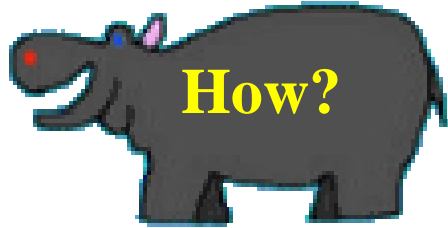
What's HIPAA?

- 1996 Federal Health Insurance Portability & Accountability Act
- Portability and continuity of health insurance
- Reduce waste, fraud and abuse
- Reduce costs through *Administrative Simplification*



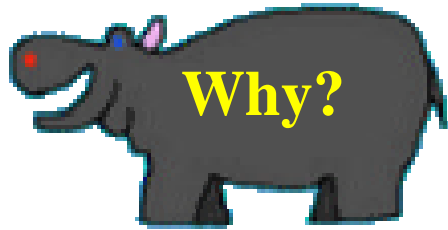
Administrative Simplification

- Increase use of electronic transactions
- Transaction Standards:
 - EDI Formats
 - Contents
- Enabling Standards:
 - Privacy & Security
 - National Identifiers

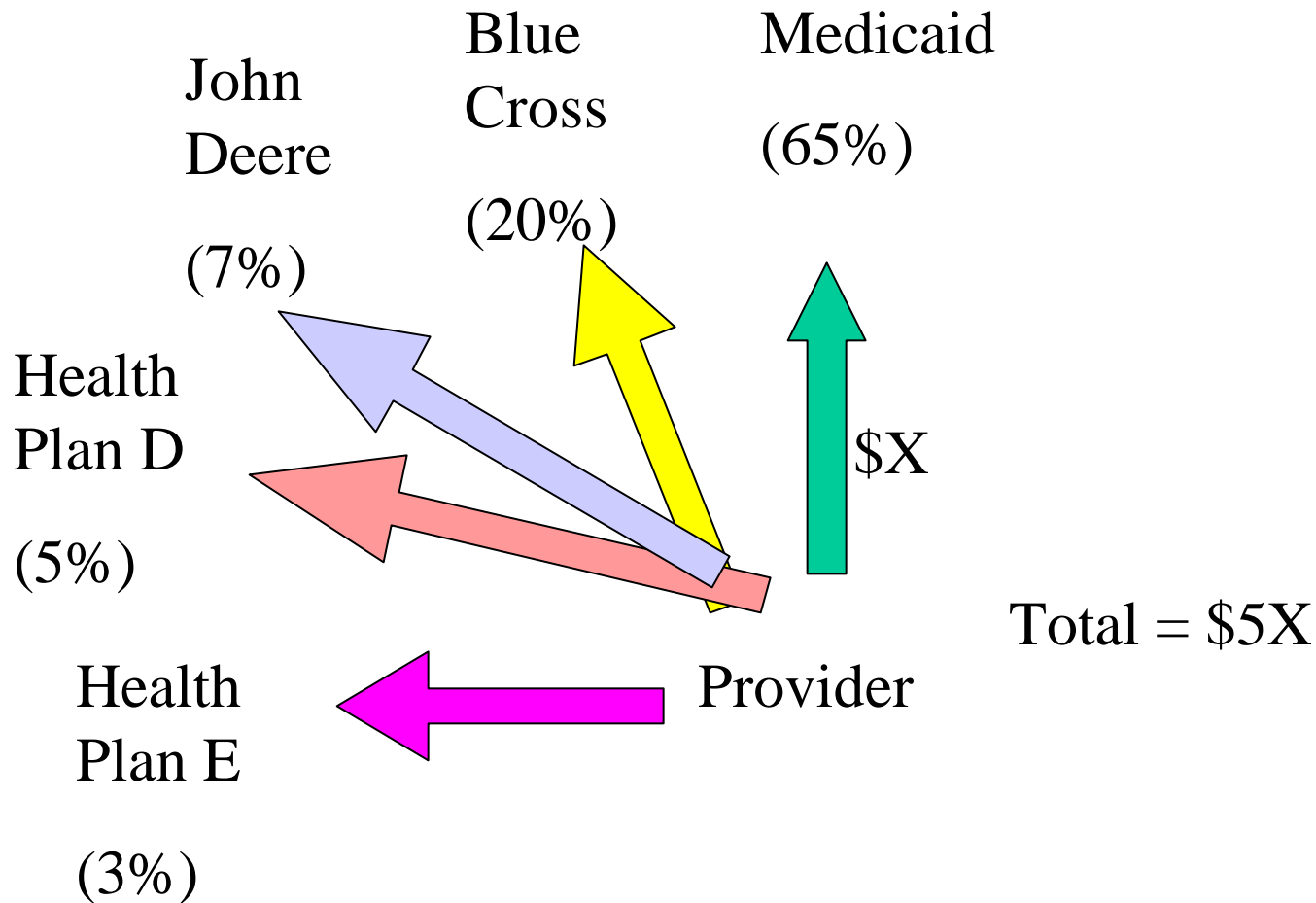


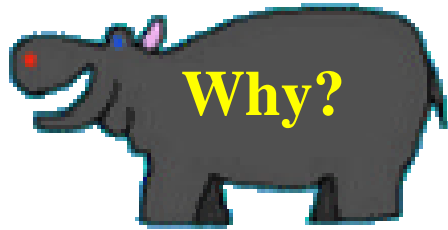
Rules

- Electronic Transactions & Code Sets (Oct 16, 2002)
 - Privacy (April 14, 2003)
 - Security
 - Identifiers
 - Enforcement
 - Penalties
- “Self-enforcing”

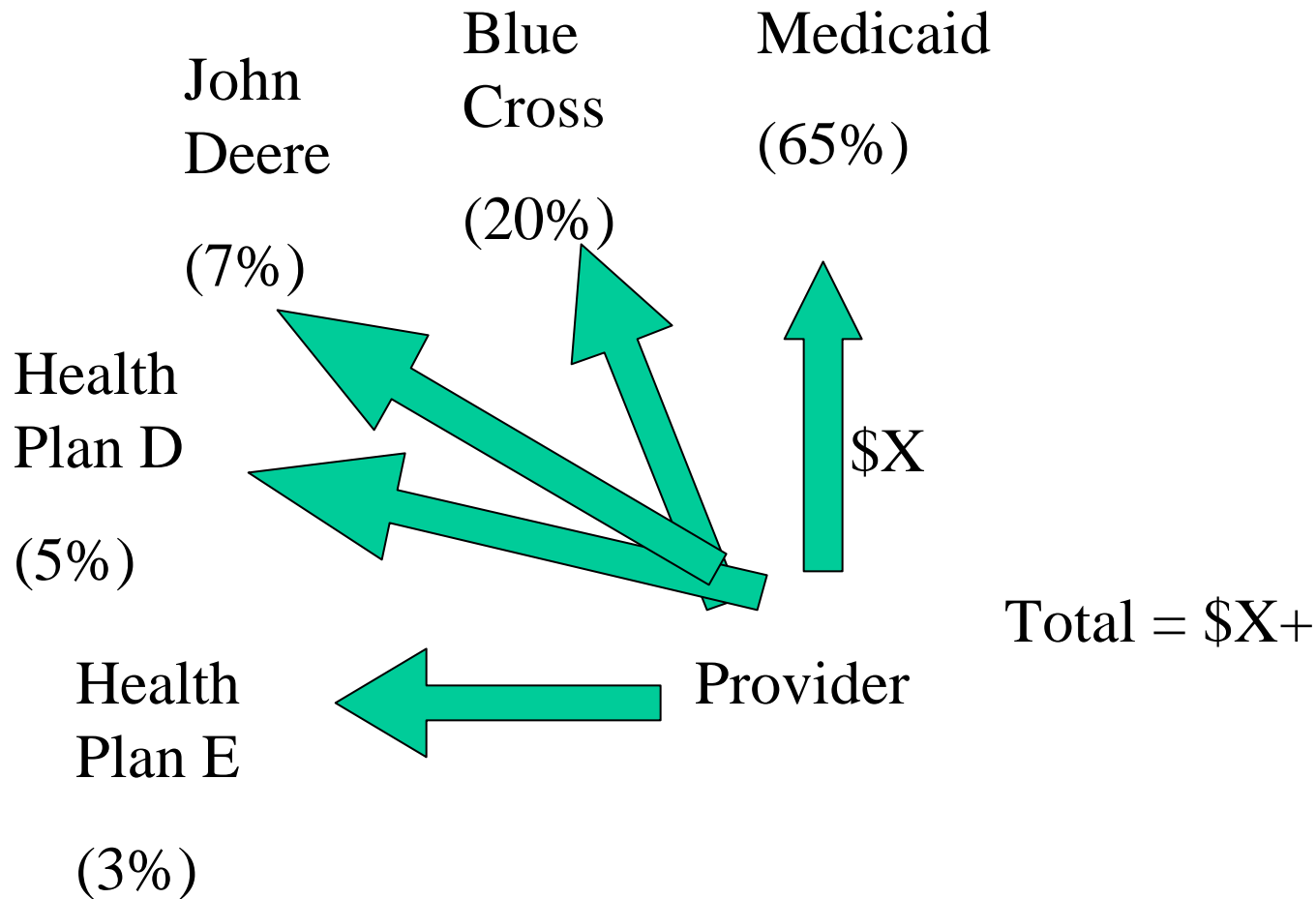


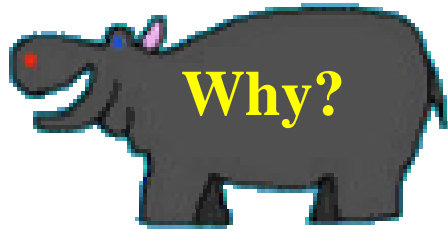
Automation without standards





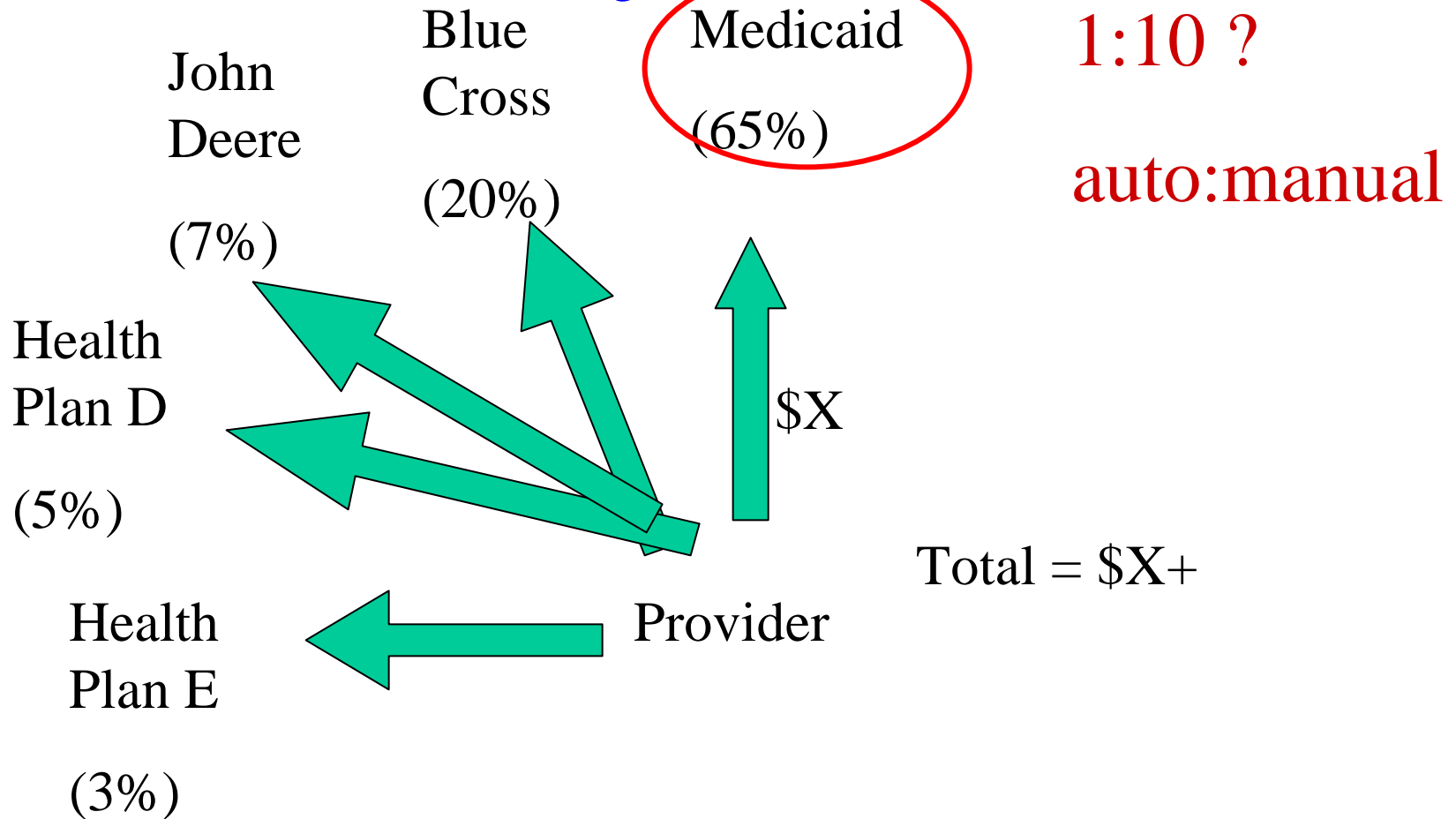
Automation with standards





Why?

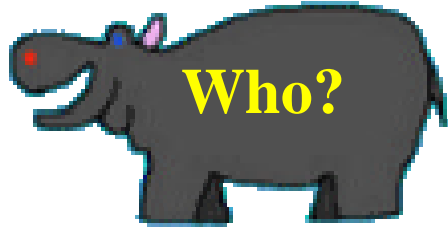
Automatic adjudication





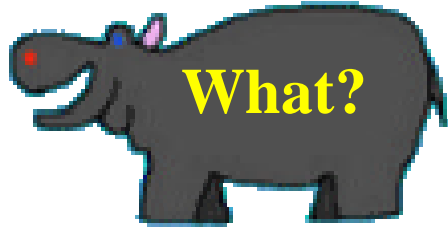
Covered Entities

- Health care providers conducting covered transactions electronically
- Health plans
- Health care clearinghouses (translation)



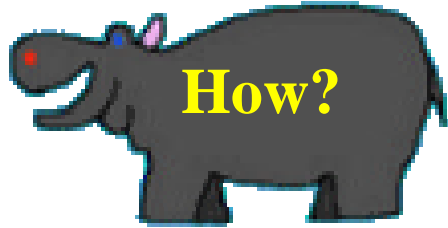
DHFS Health Plans

- Medicaid
- BadgerCare
- HIRSP (Health Insurance Risk Sharing Plan)
- Medicaid home & community based waivers (COP-W, CIP, Community Supported Living Arrangement, Brain Injury)
- Family Care
- Behavioral Health Managed Care Demos
- Partnership/PACE



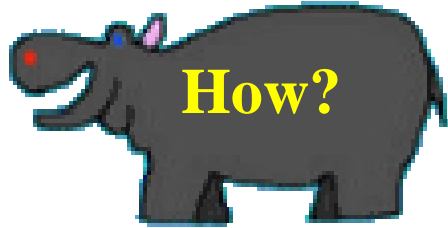
Standard Transactions

- Health claims and equivalent encounter information.
- Enrollment and disenrollment in a health plan.
- Eligibility for a health plan.
- Health care payment and remittance advice.
- Health plan premium payments.
- Health claim status.
- Referral certification and authorization.
- Coordination of benefits.



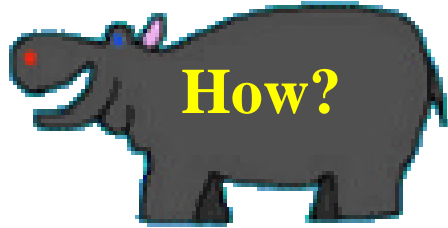
Privacy Rule

- HHS rules mandated in lieu of legislation
- Scope
 - Covered Entities
 - Personally identifiable health info
 - When & after info becomes electronic
 - Regardless of form



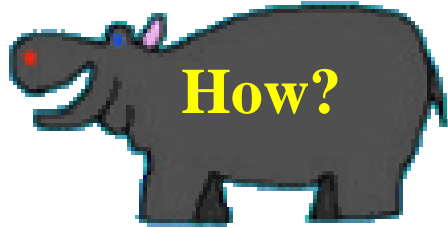
Privacy Rule

- Easy use for treatment and payment
- Limited use for national priorities (research, public health, health care system oversight, etc.)
- Written authorization for other uses



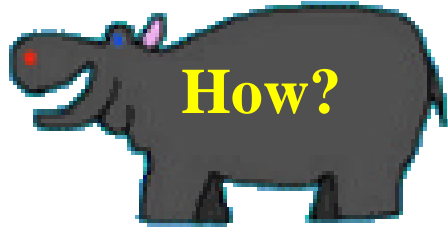
Privacy Rule

- Minimum necessary disclosure
- “Fair information practices”
 - information on use and disclosure
 - access to one’s information
 - safeguards



Privacy Rule Impacts

- Policies and procedures
- Training
- Notice of use and disclosures
- Privacy official
- Business associate agreements
- De-identification
- Preemption



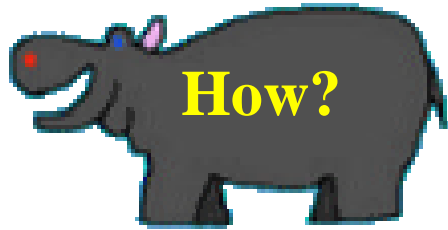
DHFS Electronic Transactions Approach

Project Coordination

Work Planning Meetings & Plan Monitoring

Business Impact Analysis	Systems & Process Analysis	Compliance Solution Design	Solution Construction	Internal & External Testing	Compliance Certification
	Transmission Protocol Analysis				

Management Reporting



DHFS Electronic Transactions Approach

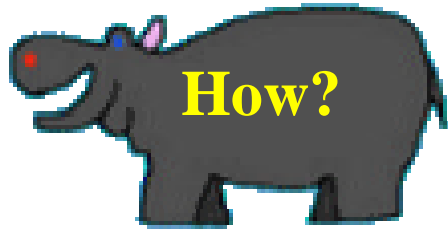
Project Coordination

Work Planning Meetings & Plan Monitoring

Business Impact Analysis	Systems & Process Analysis	Compliance Solution Design	Solution Construction	Internal & External Testing	Compliance Certification
	Transmission Protocol Analysis				

Monitoring & Reporting

- DHHS
- Legal



DHFS Electronic Transactions Approach

Project Coordination

Work Planning Meetings & Plan Monitoring

Business Impact Analysis	Systems & Process Analysis Transmission Protocol Analysis	Compliance Solution Design	Solution Construction	Internal & External Testing	Compliance Certification
--------------------------------	--	----------------------------------	--------------------------	-----------------------------------	-----------------------------

Management Reporting

Health Insurance Portability and Accountability Act

Counties as Providers

- Case Management
- Mental Health
- Community Support Program
- Crisis Intervention
- Day Treatment
- Personal Care
- Prenatal Care Coordination
- Others

Business Functions Affected by the transaction requirements of HIPAA

- Claims Submission
- Remittance and Status Reports (R&S)
- Claims Status Inquiry & Response
- Eligibility Inquiry & Response
- Prior Authorization (PA) Requests

Standard Transactions Named Under HIPAA

- Claims
 - ANSI X-12 837 Format
- Remittance & Status Report
 - ANSI X-12 835 Format
- Claims Status Inquiry & Response
 - ANSI X-12 276 and 277 Formats
- Eligibility Inquiry & Response
 - ANSI X-12 270 and 271 Formats
- Prior Authorization Request
 - ANSI X-12 278 Format
- More info at: www.wpc-edl.com

These formats contain:

- New Data Elements
- Standard Codes

National Code Sets Required under HIPAA

■ Diagnosis Codes

- ICD-9-CM

■ Procedure Codes

- CPT-4
- HCPCS
- CDT
- NDC

■ Modifiers

■ Place of Service

■ EOBs



Benefits?

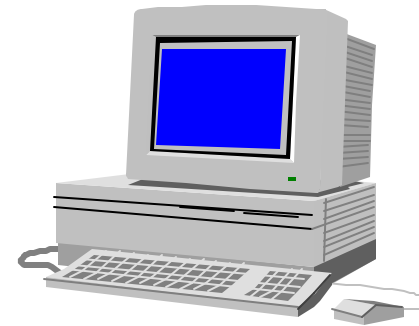
Claims Submission

Today



**Many Electronic
Formats**

After HIPAA



**One Electronic
Format**

Options for Compliance

- Code System to Format Data
- Clearinghouses
- Switches
- Value Added Networks

Medicaid's Communication Plan

- Presentations at Provider Association Meetings, Conventions, and Workshops
- Provider Information Sessions
- Provider Training
- Providers Publications including:
 - Provider Updates
 - HIPAA “inSight” Publication
 - Medicaid HIPAA link on DHFS Web Site

Transaction Time-line

- Final Transaction Rule
published on August 17, 2000
- Compliance Required by
October 16, 2002



Implementing the Electronic Transactions & Code Sets Rule

Richard Ruby

State of Wisconsin Dept. of Health and Human Services



The Game Plan

- Assemble Team
- Rule Applicability
- Agency Impact
- Systems Analysis
- Implementing Changes
- Assuring Compliance



Assemble Team

- Agency-wide representation
 - Cuts across all program areas
- Team Composition
 - Visible Executive Sponsorship
 - Coordination & Staff support
 - Program Expertise
 - Legal Services



Rule Applicability

- Determine Covered Entity Status
 - Understand Rule Requirements
 - Internal Covered Business Functions
 - External Relationships
 - Named Transactions
- Apply Interpretations Consistently
 - Seek Clarifications and Opinions
 - Authoritative Sources



Agency Impact

- Business Analysis
 - Develop Basic Business Profile
 - Inventory What You Do
 - Individually Identifiable Health Information
 - Funding Sources
 - Who you do them with
 - Map Standard Transactions to Functions
 - Inventory Support Systems
 - » Electronic
 - » Manual



Agency Impact

- Business Environment
 - Business Relationships
 - Are Contracts Impacted?
 - Communication
 - Workflow changes
 - Manual Revisions
 - Ongoing compliance



Systems Analysis

- Map Data to Implementation Guides
 - Inbound Data
 - Outbound Data
 - Compare Code Sets
- Assess Processing Requirements
 - Can you store Data you don't use?
 - Can you get your non-standard data?
 - Can you convert code sets?



Systems Analysis

- Transmission Analysis
 - Fixed Length Vs Variable Length
 - Transmission Hierarchy
 - Required EDI Format
- Infrastructure and Capacity
- Legacy Data



Implementing Change:

Leveraging Existing Investments

- Limited System Modifications
 - Integration Wrapping
 - Translator Code
- Retire & Deploy Alternative System
 - Build Totally HIPAA Compliant System
 - Purchase Compliant System
- Outsource to Clearinghouse
- Upgrade Purchased Packages



Implementing Changes:

Other Considerations

- Testing
 - Internal
 - External
- Partner Communications
- Contracts
- Policies and Procedures
- Work Processes



Implementing Changes: Resource Options

- Vendors
 - Software
 - Legal Consulting
 - Organization Readiness & Compliance
 - Security
 - Data Services
 - Training
 - Information Products



Assuring Compliance

- Certifying Agency is HIPAA Compliant
- Training
- Contracts
- Additional HIPAA Rules
- Ongoing Monitoring



Summary

- Summarize key challenges
- Thanks